

IN THE UNITED STATES BANKRUPTCY COURT  
IN THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

	)	
In Re:	)	Chapter 11
	)	
CORE SCIENTIFIC, INC, <i>et al.</i> ,	)	Case No. 22-90341 (DRJ)
	)	
DEBTORS. <sup>1</sup>	)	(Jointly Administered)
	)	

**JOINDER OF NORTH MILL EQUIPMENT FINANCE, LLC TO OBJECTION TO THE  
MOTION OF THE DEBTORS FOR ORDER EXTENDING EXCLUSIVE PERIODS  
PURSUANT TO SECTION 1121(D) OF THE BANKRUPTCY CODE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES North Mill Equipment Finance LLC (hereinafter “Movant” or “North Mill”), and files this its joinder (the “Joinder”) to the Objection to the Motion of the Debtors for Order Extending Exclusive Periods Pursuant to Section 1121(D) of the Bankruptcy Code [Doc. # 834] (the “Exclusivity Objection”), and in support thereof would respectfully show the Court the following:

1. On or about December 21, 2022, the Debtors filed their Chapter 11 cases for relief under Chapter 11 of the United States Code, Sections 101 et seq., as amended (the “Bankruptcy Code”).
2. Pursuant to § 1121(b), debtors have an exclusive 120-day period to file their Plan of Reorganization.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

3. Debtors now seek an additional 90-days to finalize a business plan that aligns with market and industry conditions “that have changed dramatically over the last few months.” Debtors state that with this Business Plan, they will be able to form the basis for the Debtor’s plan or reorganization.

4. North Mill joins with Wingspire Equipment Finance LLC f/k/a Liberty Commercial Finance LLC, Prime Alliance Bank, Inc., and 36<sup>th</sup> Street Capital Partners, LLC (the “Wingspire Objectors”) in their Objection to the Motion of the Debtors for Order Extending Exclusive Periods Pursuant to Section 1121(D) of the Bankruptcy Code filed on May 1, 2023.

5. North Mill further states that the bitcoin market is extremely volatile and inasmuch as bitcoin is rising now, it can decline tomorrow which would render any Business Plan that the Debtors are going to propose obsolete as the Debtors continue to use North Mill’s equipment (the “Collateral”). Debtors have stated in their objection to North Mill’s Motion for Relief from Stay [Doc. # 879] that “the North Mills Collateral is necessary to an effective reorganization” and that “the Debtors rely on the North Mill Collateral to operate their Marble Facility, which is instrumental to the Debtors’ operations and an integral part of the Debtors’ post-emergence business plan.” Yet, North Mill is not being paid for the use of its Collateral.

6. North Mill is concerned that the Debtors have benefitted during the course of the chapter 11 cases from the rise of bitcoin rates while not making payments to North Mill or other equipment lenders.

WHEREFORE, PREMISES CONSIDERED, North Mill incorporates by reference the Wingspire Objectors Exclusivity Objection and joins with the Wingspire Objectors in their Objection to the Motion of the Debtors for Order Extending Exclusive Periods Pursuant to Section 1121(D) of the Bankruptcy Code.

**Respectfully submitted,**

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**CERTIFICATE OF SERVICE**

I certify that on Friday, May 19, 2023, a true and correct copy of the foregoing document was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notices.

/s/ Christopher V. Arisco  
Christopher V. Arisco